

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**NOTICE OF CORRESPONDENCE REGARDING THE ONE HUNDRED TWENTY-  
FOURTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE  
COMMONWEALTH OF PUERTO RICO, PUERTO RICO HIGHWAYS AND  
TRANSPORTATION AUTHORITY, AND EMPLOYEES RETIREMENT SYSTEM OF  
THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO TO  
INDIVIDUAL PROOF OF CLAIM NO. 146528.**

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To the Honorable United States District Judge Laura Taylor Swain:

1. On January 14, 2020, the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”), and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the sole

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

representative of the Commonwealth, HTA and ERS (collectively, the “Debtors”) pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),<sup>2</sup> filed the *One Hundred Twenty-Fourth Omnibus Objection of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [ECF No. 9892] (the “One Hundred Twenty-Fourth Omnibus Objection”) to various proofs of claim.

2. The One Hundred Twenty-Fourth Omnibus Objection seeks to disallow deficient claims which purport to assert liabilities against the Commonwealth, HTA, or ERS, but which fail to provide critical information needed to understand what liabilities any of the Commonwealth, HTA, ERS, or any other Title III Debtor may owe.

3. The Debtors have received the attached correspondence from Francisco Beltrán Cintrón (“Beltrán Cintrón”), a copy of which is attached hereto as Exhibit “A” (the “Beltrán Cintrón Response”), regarding Proof of Claim No. 146528 (the “Beltrán Cintrón Claim”). A certified translation of the Beltrán Cintrón Response is attached hereto as Exhibit “A-1”.

4. The Beltrán Cintrón Response consists of a copy of the Beltrán Cintrón Claim. The Beltrán Cintrón Response does not, however, contain any information necessary to evaluate the Beltrán Cintrón Claim, such as an explanation of the basis for the Beltrán Cintrón Claim. The Debtors have therefore determined that the Beltrán Cintrón Response still does not provide sufficient information to enable the Debtors to reconcile the Beltrán Cintrón Claim. Accordingly, the Debtors respectfully request that the Court grant the One Hundred Twenty-Fourth Omnibus Objection and disallow the Claim, notwithstanding the Beltrán Cintrón Response.

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<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

Dated: November 13, 2020  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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